

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ANTHONY TRUPIA,

Plaintiff,

v.

HERITAGE HARD ASSETS LLC; KYLE PATTON, individually as Manager/Officer of HERITAGE HARD ASSETS LLC; HLV VENTURES, an unregistered New York company; REAGAN GOLD GROUP, LLC; STEVE FRANCIS, individually as Manager/Officer of REAGAN GOLD GROUP, LLC; WORLD HARVEST CHURCH, INC. ; ROD PARSLEY, individually as Manager/Officer of WORLD HARVEST CHURCH, INC.; SOUTH BAY GALLERIES LLC; BRANDON MENDELSON, individually as Manager/Officer of SOUTH BAY GALLERIES LLC; TELNYX LLC; DAVID CASEM, individually as Manager/Officer of TELNYX LLC; IAN EITHER, individually as Manager/Officer of TELNYX LLC; JAMES WHEDBEE, individually as Manager/Officer of TELNYX LLC; MANDI MENA, individually as Manager/Officer of TELNYX LLC; ONVOY, LLC; BRETT SCORZA, individually as Manager/Officer of ONVOY, LLC; JAMES HYNES, individually as Manager/Officer of ONVOY, LLC; G EDWARDS EVANS, individually as Manager/Officer of ONVOY, LLC; MATTHEW CARTER JR, individually as Manager/Officer of ONVOY, LLC; LEVEL 3 COMMUNICATIONS, LLC; JEFF STOREY, individually as Manager/Officer of LEVEL 3 COMMUNICATIONS, LLC; ZEBERSKY PAYNE SHAW LEWENZ, a Florida law firm; ZACHARY D LUDENS, individually as an attorney of ZEBERSKY

Case No. CIV-24-498-SLP

PAYNE SHAW LEWENZ; and DOES 1  
through 100, inclusive,

Defendants.

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**DEFENDANT ONVOY, LLC’S NOTICE OF JOINDER IN REMOVAL**

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Defendant Onvoy, LLC, through its undersigned attorneys, files this joinder in Defendant HLV Ventures’ removal under 28 U.S.C. §§ 1331, 1441, 1446.

1. Plaintiff is Anthony Trupia (“Plaintiff”); Onvoy, LLC (“Onvoy”) is named as one of the defendants.

2. On April 22, 2024, Plaintiff sued Onvoy and the other above-captioned defendants in the District Court of Oklahoma County, Oklahoma alleging violations of the Telemarketing and Consumer Fraud and Abuse Prevention Act (15 U.S.C. §6101, *et seq.*), the Telemarketing Sales Rule (16 C.F.R. §310, *et seq.*), the Telephone Consumer Protection Act (47 U.S.C. § 227, *et seq.*), as well as Oklahoma state laws.

3. Onvoy was served on April 29, 2024.

4. On May 15, 2024, HLV Ventures filed a notice of removal to this Court.

5. Onvoy agrees with the basis for the notice of removal, as original jurisdiction is proper over Plaintiff’s claims brought under federal law. Onvoy consents to removal of this suit to this Court.

Dated: May 20, 2024

Respectfully submitted,

/s/ Nicholas V. Merkley

Nicholas (“Nick”) V. Merkley, OBA No. 20284

Gerard D’Emilio, OBA No. 33496

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*Attorneys for Onvoy, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2024, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing and served on the following via First-Class United States Mail:

Anthony Trupia  
605 SE 21st St.  
Oklahoma City, OK 73129

/s/ Nicholas V. Merkley